



August 25, 2014

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*RE: MB Docket No. 14-57*

Dear Chairman and Commissioners:

On behalf of the National Urban League, I respectfully submit these comments with regard to the proposed transaction between Comcast and Time Warner Cable. On the basis of our experience and partnership with Comcast and its commitment to diversity, we support this proposed merger.

Four years ago, the National Urban League, NAACP and National Action Network announced a historic Memorandum of Understanding (MOU) with Comcast and NBCUniversal to expand diversity initiatives across the spectrum of areas including programming, procurement, investment and employment. This agreement represented a positive step towards the principles of diversity, inclusion and economic opportunity.

Following its acquisition of NBCUniversal and pursuant to the MOU, Comcast formed a Joint Diversity Advisory Council (JDC) composed of external leaders representing the diversity of our nation to assess and inform diversity and inclusion initiatives. As co-chair of the JDC, I can attest that Comcast's senior executive leadership has been fully engaged in our discussions and have worked to embed diversity and inclusion in the company's operating principles.

In making the seminal decision to take the actions required to be a leader on diversity, Comcast has engaged in a transparent process to measure its progress through rigorous benchmarking and reporting mechanisms. I applaud Comcast

NBCUniversal for its work thus far to build a first-class American enterprise whose executives, employees, suppliers and practices mirror our country's 21<sup>st</sup> century diversity.

While there is still work to do, the company has made measurable progress. Following is a brief summary of significant benchmarks yielded as a result of our MOU with Comcast:

- The company added another African American to its Board of Directors, which created a **board that is now one-third diverse**.
- In 2013, more than **40 percent** of all full-time U.S. employees at Comcast and NBCUniversal were people of color, with **African Americans comprising 21 percent**.
- People of color accounted for **40 percent** of net hires and promotions into executive positions.
- As a result of participating in more than 200 supplier diversity outreach events across the U.S. over the past three years, Comcast has registered more than **3,500 diverse suppliers**.
- \$768 million was spent on minority-owned business enterprise partners serving as prime suppliers in 2013, an **86 percent** increase since the year before the NBCUniversal transaction.
- In 2011, Comcast established a **\$20 million** venture capital "Catalyst Fund" for investments led by diverse entrepreneurs.
- Since the MOU, Comcast has launched **two new independent networks** – REVOLT TV and ASPIRE – with several more in development that deliver programming of interest to African American audiences.

In addition to expanding the diversity of its workforce at all levels and engaging a significantly more diverse supplier base, Comcast has continued to be a leader in its partnerships with civil rights organizations. The National Urban League and many of our 93 affiliates in more than 300 communities across the country have worked hand-in-hand with Comcast to promote broadband adoption and advance policies that will deliver jobs, economic empowerment and social justice to African Americans and other communities of color nationwide.

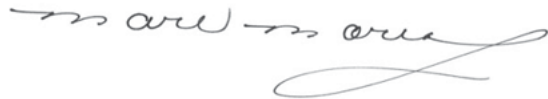
Currently, Comcast has agreed to apply the MOU and its provisions to the proposed merger with Time Warner Cable. With the advice of the JDC, Comcast will formulate a new master strategic plan that will establish the vision and best-in-class goals for the proposed new company's diversity program.

Beyond simply expanding current diversity practices to new markets, Comcast has cultivated a culture that will allow the application of the most effective approaches to diversity. Throughout this process, we will continue our conversations with Comcast to ensure that the company's corporate diversity

practices continue to reflect and respect the multiculturalism of its employees, customer base and our nation.

We urge the Commission to strongly consider the issues of diversity, inclusion and economic opportunity in its public interest review and look forward to the successful approval of this proposed transaction.

Sincerely,

A handwritten signature in cursive script, appearing to read "marc morial". The signature is written in a fluid, connected style with a large loop at the end.

Marc H. Morial  
President & CEO  
National Urban League